

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA,**

**v.**

**DEVOS LTD. d/b/a Guaranteed  
Returns, et al.**

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**CRIMINAL ACTION**

**NO. 14-574 (PBT)**

**DECLARATION OF DEAN VOLKES**

I, DEAN VOLKES, declare as follows:

1. I was the Chief Executive Officer and sole owner of Devos Ltd. d/b/a Guaranteed Returns (“Guaranteed Returns” or the “Company”) for a period that includes April 5, 2011 through October 29, 2014.
2. As CEO and sole owner, I maintained an office at the Company’s headquarters located at 100 Colin Drive, Holbrook, New York 11741.
3. My office was walled off from the rest of the Company’s workspace. It could only be accessed through a single door, which had a lock. I did not share my office with anyone else, and other employees were not allowed to enter my office without my permission. I regularly locked my office door when I left at night.
4. In my office, I had a desk with drawers, a credenza, and a book case. I also had a desktop computer that sat on my desk.
5. I kept many personal items in my office, including personal financial records, personal tax documents, and personal bills. Many of these documents were kept in a drawer of my desk or in the credenza.
6. I used the computer in my office for both personal matters and for Company business. My computer was protected by a password.

7. I had a Guaranteed Returns email address which I used for both personal matters and for Company business. My email account was protected by the password that protected my computer.

8. I also maintained a storage area in the office across the hall from my office.

9. The storage area could only be accessed through a single door, which had a lock. I had the key to that lock, and individuals who wished to access the storage area could do so only with my permission.

10. The storage area contained Company-related documents, as well as my personal documents.

11. Based on the above facts, it was my expectation that the items in my office and in the storage area would remain under my control and would not be available to others absent my consent.

12. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Port Jefferson, New York  
January 11, 2016

  
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Dean Volkes

**CERTIFICATE OF SERVICE**

I, Robert J. Cleary, Esquire, hereby certify that the following documents have been filed electronically and are available for viewing and downloading from the Electronic Case Filing system: (1) the Declaration of Donna Fallon In Support Of Defendants' Pretrial Motions; (2) the Declaration of Dean Volkes In Support Of Defendants' Pretrial Motions; (3) Defendants' Motion To Seal; and (4) Defendants' Proposed Sealing Order. Notice has been sent through the ECF system to counsel of record, who have all consented to electronic service, including Assistant United States Attorneys Nancy Rue and Patrick Murray.

Dated: New York, New York  
January 13, 2016

/s/ Robert J. Cleary

PROSKAUER ROSE LLP  
11 Times Square  
New York, New York 20036  
Tel. 212.969.3000  
Fax 212.969.2900  
wkomaroff@proskauer.com

*Attorneys for Defendant Donna Fallon*